

THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ILHAME AZZIZ,)	
Plaintiff)	
)	
V.)	CIVIL ACTION FILE NO.
)	05-10751-NMG
)	
MICHAEL CHERTOFF, as Secretary of the Department)	
Homeland Security; EDUARDO AGUIRRE, as)	
Director of the U.S. Citizenship & Immigration)	
Services; DENIS C. RIORDAN, District Director)	
of the U.S. Citizenship & Immigration Services)	
for Boston, Massachusetts)	
Defendants)	

ASSENTED TO MOTION TO STAY PROCEEDINGS

NOW comes the plaintiff in the above-captioned matter, and hereby requests this Honorable Court to stay these proceeding for a period of sixty days to allow for the plaintiff's Application for Naturalization to be processed by the United States Citizenship and Immigration Service (USCIS). As grounds of this motion the plaintiff submits as follows:

This action involves an Application for Naturalization filed with the United States Citizenship and Immigration Service which has a processing priority date of June 21, 2005. (See attached Exhibit A) The parties have been actively attempting to process the above-referenced application, which would either expedite or potentially resolve this matter. However a brief extension of time is necessary in order to achieve this.

A stay of these proceedings (1) will be relatively short in duration, (2) would cause no serious damage to the public interest, (3) would not adversely affect in any way the interest of either the government or the petitioner, (4) would impose no burden on the court, and (5) it may serve to resolve or narrow the scope of this litigation.

WHEREFORE, plaintiff hereby requests this Honorable Court to stay these proceeding for a period of sixty days or any period of time deemed appropriate.

The Defendants,

/s/ Christopher R. Donato

Christopher R. Donato
Assistant U.S. Attorney
U.S. Attorney's Office
John Joseph Moakley Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
617. 748.3303

The Plaintiff,
By her Attorneys,

/s/ Desmond P. FitzGerald

Desmond P. FitzGerald
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Bar No. 68344

EXHIBIT A

Receipt Notice for N400 Application for Naturalization



Receipt			NOTICE DATE June 30, 2005
CASE TYPE N400 Application For Naturalization			INS A# A 073 231 211
APPLICATION NUMBER ESC*001446628	RECEIVED DATE June 21, 2005	PRIORITY DATE June 21, 2005	PAGE 1 of 1

APPLICANT NAME AND MAILING ADDRESS

ILHAME AZZIZ
c/o DESMOND P FITZGERALD
FITZGERALD COMPANY LLC
18 TREMONT STREET SUITE 210
BOSTON MA 02108

|||||

PAYMENT INFORMATION:

Single Application Fee: \$390.00
Total Amount Received: \$390.00
Total Balance Due: \$0.00

The above application has been received by our office and is in process. Our records indicate your personal information is as follows:

Date of Birth: March 02, 1973
Address Where You Live: 230 WILLARD STREET APT 107
QUINCY MA 02169

Please verify your personal information listed above and immediately notify our office at the address or phone number listed below if there are any changes.

You will be notified of the date and place of your interview when you have been scheduled by the local INS office. You should expect to be notified within 365 days of this notice.

If you have any questions or comments regarding this notice or the status of your case, please contact our office at the below address or customer service number. You will be notified separately about any other cases you may have filed.

If you have other questions about possible immigration benefits and services, filing information, or INS forms, please call the INS National Customer Service Center (NCSC) at 1-800-375-5283. If you are hearing impaired, please call the NCSC TDD at 1-800-767-1833.

If you have access to the Internet, you can also visit INS at www.ins.usdoj.gov. Here you can find valuable information about forms and filing instructions, and about general immigration services and benefits. At present, this site does not provide case status information.

INS Office Address:
US IMMIGRATION AND NATURALIZATION SERVICE
75 LOWER WELDEN STREET
ST ALBANS VT 05479-

INS Customer Service Number:
(800) 375-5283

REPRESENTATIVE COPY

ESC\$001422415



Form I-797C (Rev. 09/31/04) N

CERTIFICATE OF SERVICE

I hereby certify that the foregoing documents, Assented to Motion to Stay Proceedings and Supporting Documents, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on February 13, 2006.

/s/Desmond P. FitzGerald

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